

August 27, 2026

David Reinhold
Cleveland-Cliffs Steel Corporation
1801 Crawford St
Middletown OH 45044
david.reinhold@clevelandcliffs.com

**Re: Cleveland-Cliffs Steel Corporation
Notice of Violation (NOV)
Resolution of Violation (ROV)
Air Permit
Butler County
1409010006**

Southwest Ohio Air Quality Agency

Subject: Notice of Violation / Resolution of Violation

Dear Mr. Reinhold:

On August 13, 2026, Cleveland-Cliffs Steel Corporation (Cliffs) submitted a malfunction report for a blast furnace (Emissions Unit P925) bleeder event caused by a burden slip. The malfunction report stated that the blast furnace bleeder event occurred on August 13, 2026, at 3:35 pm for a total of 52 seconds, resulting in an estimated calculated release of 77.56 pounds of particulate emissions (PE).

Findings

1. As a result of the review of the malfunction report submitted August 13, 2026, and engineering calculations, SWOAQA has determined that the following violations of Ohio's ORC Chapter 3704, OAC Chapter 3745, and Cliffs permit terms and conditions.

ORC 3704.05(C): *"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."*

Permit Terms and Conditions: *Permit-To-Operate P0131945 term C.16.b)(1)b.: "PE from all stacks (stove stack, flare stack, bleeder valve stacks, and casthouse baghouse) associated with this emissions unit, combined, shall not exceed 73.8 pounds per hour."*

OAC rule 3745-17-11(B): *"...any owner or operator of a source of particulate emissions which is located within [Butler County] shall operate said source so that the particulate emissions do not exceed the allowable emission rate specified by ... "Table I" in the appendix to this rule"*

- (a) Violation: Engineering calculations of PE during the event on August 13, 2026, exceeded 73.8 pounds per hour. Calculated PE based on data submitted by Cliffs indicates emissions from the 52-second event to be 77.56 pounds of uncontrolled PE.

Resolution of Violation

Based upon a review of the malfunction report submitted August 13, 2026, the facility reported the duration of the event was 52 seconds. The report further states "all actions necessary and required by any applicable preventive maintenance and malfunction abatement plan will be or have been implemented"

Conclusion

Please note that this does not preclude the Director from seeking additional administrative or civil penalties pursuant to Ohio Revised Code section ORC Section 3704.06 for the violation(s).

Thank you for your time and cooperation and if you have any questions, please do not hesitate to contact Ciara Wagner by phone at (513) 319-5242 or by e-mail at ciara.wagner@hamiltoncountyoh.gov.

Sincerely,

A handwritten signature in black ink that reads "Ciara Wagner". The signature is written in a cursive, flowing style.

Ciara Wagner
Environmental Compliance Specialist

Sent via email

cc: Joshua Koch/Zachary Peterson, DAPC/CO
Brian Dickens, US EPA
Kerri Castlen/Kurt Smith, SWOAQA
Michael Bathe, Cleveland-Cliffs Steel Corporation